July 16, 2002 Certified Mail 9059 7486

Kenneth F. Moses
Plant Environmental Engineer
Unilever HPC, USA
1200 Calumet Avenue
Hammond, Indiana 46320

Re: 089-15624-00229
First Administrative Amendment to
Part 70 - T089-6623-00229

Dear Mr. Moses:

Unilever HPC USA was issued a Part 70 permit on April 19, 2002 for a soap manufacturing plant. A letter requesting a modification to that permit was received on May 13, 2002.

The requested re-configuration of equipment does not increase the current permitted nominal maximum rates of soap production and removes some unnecessary permitted equipment. Therefore, the overall potential to emit is decreased.

The request revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term. Therefore, in accordance with 326 IAC 2-7-11, your Part 70 permit is hereby administratively amended as follows:

Proposed Changes:

The following changes were agreed to and made as the First Administrative Amendment for this source (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. On page 4 and 5 of 69, in the Table of Contents, Section D.5, Facility Conditions - Soap Dryer/Cleanout System has been struck out as follows because fatty acids are no longer used to clean dryers and the soap dryer/cleanout systems are no longer a source of emissions:

~~**D.5 FACILITY CONDITIONS - Soap Dryer/Cleanout System** 52~~

D.5 FACILITY CONDITIONS - This section has been intentionally left blank. **52**

~~**Emission Limitations and Standards [326 IAC 2-7-5(1)]**~~
~~D.5.1 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1]~~
~~D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~**Compliance Determination Requirements**~~

~~D.5.3 Particulate Matter (PM)~~

~~**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**~~

~~D.5.4 Visible Emissions Notations~~

~~**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**~~

~~D.5.5 Record Keeping Requirements~~

2. On page 8 of 69, in Section A.2, Emission Units and Pollution Control Equipment Summary, the unit description for item 3) c) is modified as follows to add two (2) rework systems. This addition does not increase the maximum throughput of soap handled or the potential to emit:

   c) Five (5) Noodles Bins, **Two Rework Systems,** and One (1) Scrap Soap Kettle, identified as Unit 13, constructed in 1979, controlled by a filter bag collector with a maximum of 32,880 pounds per hour of soap handled and exhausting to Stack 15.

3. On page 8 of 69, in Section A.2, Emission Units and Pollution Control Equipment Summary, the unit descriptions for the Hard Soaps Finishing Lines 3) d) and 3) e) are deleted as follows and combined to form the following new d):

   ~~d) Hard Soaps Finishing Lines No. 1, 2 and 3, identified as Unit 14, constructed in 1979, controlled by three (3) dust collectors, with a maximum capacity of 29,425 pounds per hour and exhausting to Stack 16.~~

   ~~e) Hard Soaps Finishing Lines No. 5, 7 and 8, identified as Unit 15, constructed in 1979, controlled by three (3) dust collectors, with a maximum capacity of 29,425 pounds per hour and exhausting to Stack 17.~~

   d) Tallow Finishing Lines 8, 9, 10, 11, 12 and 13, constructed in 1979, and reconfigured in 2002, controlled by three (3) dust collectors, with a maximum design rate of 59,000 pounds per hour, and exhausting to Stacks 16, 17, and 17A.

4. On pages 8, 9 and 10 of 69, unit descriptions f) through w) are re-designated e) through v) to provide for the deletion of e).

5. On page 10 of 69, the unit description for v) Sample Detergent Bar Soap Line is deleted as follows because it has been included in the new Tallow Finishing Lines d) above:

   ~~v) Sample Detergent Bar Soap Line, identified as Unit 45, constructed in 1979, including soap supply hopper, conveyors, refiner feed hopper and soap return conveyors, controlled by a dust collector, with a maximum design rate of 1,688 pounds per hour of material handled and exhausting to Stack 17A.~~

6. On page 10 of 69, the unit description w) for the #1 and #2 Noodle Bins, is re-designated as u) because of the deletion of e) and v).

7. On pages 10 and 11 of 69, the Soap Dryer / Cleanout Systems 5) a) and b) are deleted as follows because fatty acids are no longer used to clean dryers and the soap dryer / cleanout systems are no longer a source of emissions:

~~5) Soap Dryer/Cleanout Systems identified as follows:~~

5) This section has been intentionally left blank.

~~a) Soap Dryer/Cleanout System Tank No. 1, identified as Unit 46, constructed in 1979, used to clean the interiors of the three (3) soap dryers in the Bar Finishing Department, controlled by a mist eliminator, with a maximum amount of fatty acid recirculated of 168,000 pounds per hour and exhausting to Stack 18A.~~

~~b) Soap Dryer/Cleanout System Tank No. 2, identified as Unit 47, constructed in 1979, used to clean the interiors of the three (3) soap dryers in the Bar Finishing Department, controlled by an impingement separator, with a maximum amount of fatty acid circulated of 168,000 pounds per hour, and exhausting to Stack 19A.~~

8. On pages 43, 44, and 45 of 69, Section D.3, Facility Operation Conditions, the Facility Description Box for "Manufacturing Processes controlled by Dust Collector Systems" has been modified as follows to incorporate the changes:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Manufacturing Processes controlled by Dust Collector Systems, identified as follows:

a) Soap Rework Grinding Process, identified as Unit 11, constructed in 1979, controlled by a dust collection system, with a maximum capacity of 4,167 pounds per hour and exhausting to Stack 13.

b) Three (3) Vacuum System Soap Dryers, identified as Unit 12, constructed in 1979, controlled by a bag collector with a combined maximum amount of soap produced for all three dryers of 28,713 pounds per hour and exhausting to Stack 14.

c) Five (5) Noodles Bins, **Two (2) Rework Systems,** and One (1) Scrap Soap Kettle, identified as Unit 13, constructed in 1979, controlled by a filter bag collector with a maximum of 32,880 pounds per hour of soap handled and exhausting to Stack 15.

~~d) Hard Soaps Finishing Lines No. 1, 2 and 3, identified as Unit 14, constructed in 1979, controlled by three (3) dust collectors, with a maximum capacity of 29,425 pounds per hour and exhausting to Stack 16.~~

~~e) Hard Soaps Finishing Lines No. 5, 7 and 8, identified as Unit 15, constructed in 1979, controlled by three (3) dust collectors, with a maximum capacity of 29,425 pounds per hour and exhausting to Stack 17.~~

d) Tallow Finishing Lines 8, 9, 10, 11, 12 and 13, constructed in 1979, and reconfigured in 2002, controlled by three (3) dust collectors, with a maximum design rate of 59,000 pounds per hour, and exhausting to Stacks 16, 17, and 17A.

~~f)~~ **e)** Soap Noodle Bin No. 1 Dust Collection System (DC-5), identified as Unit 18, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 20.

~~g)~~ **f)** Soap Noodle Bin No. 2 Dust Collection System (DC-6), identified as Unit 19, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 21.

~~h)~~ **g)** Soap Noodle Bin No. 3 Dust Collection System (DC-7), identified as Unit 20, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 22.

~~i)~~ **h)** Chip Mixer No. 1, identified as Unit No. 21, constructed in 1985, controlled by a dust collection system (DC-8), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

~~j)~~ **i)** Chip Mixer No. 2, identified as Unit No. 22, constructed in 1985, controlled by a dust collection system (DC-9), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

~~k)~~ **j)** Chip Mixer Nos. 3 and 4, identified as Unit No. 23, constructed in 1985, controlled by a dust collection system (DC-10), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

~~l)~~ **k)** Powder Dye Mixing System, identified as Unit 24, constructed in 1985, controlled by a dust collection system (DC-4), with a maximum capacity of 10 pounds per hour and exhausting to Stack 26.

~~m)~~ **l)** Zinc Oxide Catalyst Weigh Station and three Chill Rolls (Lines 1, 2, & 3), identified as Unit 25, constructed in 1985, controlled by a dust collection system (DC-3), with a maximum design rate of soap to be processed of 18,000 pounds per hour and exhausting to Stack 27.

~~n)~~ **m)** Detergent Bar Soap Facility Milling and Pelletizing, identified as Unit 26, constructed in 1985, controlled by a dust collection system (DC-1), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 28.

~~o)~~ **n)** Three (3) Chill Roll Apron Conveyors and Screw Conveyors (Lines 1, 2, & 3), identified as Unit 27, constructed in 1985, controlled by a dust collection system (DC-2), with a maximum capacity of 18,000 pounds per hour and exhausting to Stack 29.

~~p)~~ **o)** Flex-Kleen Dust Collector System (DC-1053), identified as Unit 31, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 3A.

~~q)~~ **p)** Flex-Kleen Dust Collector System (DC-1054), identified as Unit 32, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 4A.

~~r)~~ **q)** Flex-Kleen Dust Collector System (DC-1055), identified as Unit 33, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 5A.

~~s)~~ **r)** Flex-Kleen Dust Collector System (DC-1056), identified as Unit 34, constructed in 1990, used to control the exhaust from a soap noodle bin, a rework feed hopper, a remelt hopper, and Detergent Bar Soap Manufacturing Line No. 5 Noodle Bin when producing product, and Line No. 4, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 6A.

~~t)~~ **s)** Flex-Kleen Dust Collector System (DC-1052), identified as Unit 35, constructed in 1990, used to control the exhaust from pick-up points along Bar Soap Finishing Lines #4 and #5. Pick-up points are distributed for maximum dust reduction along the lines including plodder/extruder hoppers, duplex refiners, apron/screw conveyors, incline conveyors, pelletizing refiners, noodle hoppers, and chip mixers, rework grinder and the TiO2 dump station. The unit has a maximum capacity of 5,976 pounds per hour and exhausts to stack 7A.

~~u)~~ **t)** Flex-Kleen Dust Collector System (DC-1051), identified as Unit 36, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausts to stack 8A.

~~v) Sample Detergent Bar Soap Line, identified as Unit 45, constructed in 1979, including soap supply hopper, conveyors, refiner feed hopper and soap return conveyors, controlled by a dust collector, with a maximum design rate of 1,688 pounds per hour of material handled and exhausting to Stack 17A.~~

~~w)~~ **u)** No. 1 and No. 2 Noodle Bins, identified as Unit 48, constructed in 1979, controlled by a dust collector, with a maximum capacity of 10,000 pounds per hour and exhausting to Stack 46.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

9. On page 46 of 69, Condition D.3.3, Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)], the PM_{10} emission limit table is modified as follows to incorporate the above changes:

The individual stack PM_{10} SIP limitations in 326 IAC 6-1-10.1(d) do not change.

Emission Unit Description	Emission Unit ID #	PM_{10} Emission Limit (gr/dscf)	PM_{10} Emission Limit (lbs/hr)
Soap Rework Grinding Process	11	0.020	0.250
Three (3) Vacuum System Soap Dryers	12	0.020	0.120
Five (5) Noodles Bins, **Two (2) Rework Systems,** and One (1) Scrap Soap Kettle	13	0.020	0.860
~~Hard Soaps Finishing Lines No. 1, 2 and 3~~	~~14~~	~~0.020*~~	~~1.540*~~
~~Hard Soaps Finishing Lines No. 5, 7, and 8~~	~~15~~	~~0.020*~~	~~1.540*~~
Tallow Finishing Lines 8, 9, 10, 11, 12 and 13	**14/15**	**0.020***	**1.540***
Soap Noodle Bin No. 1 Dust Collection System	18	0.020	0.210
Soap Noodle Bin No. 2 Dust Collection System	19	0.020	0.210
Soap Noodle Bin No. 3 Dust Collection System	20	0.020	0.210
Chip Mixer No. 1	21	0.020**	0.720**
Chip Mixer No. 2	22	0.020**	0.720**
Chip Mixer No. 3 and 4	23	0.020**	0.720**
Powder Dye Mixing System	24	0.020	0.130
Zinc Oxide Catalyst Weigh Station and Three Chill Rolls	25	0.020	0.800
Detergent Bar Soap Facility Milling and Pelletizing	26	0.020	1.03
Three (3) Chill Roll Apron Conveyors and Screw Conveyors	27	0.020	1.090
Flex-Kleen Dust Collector System (DC-1053)	31	0.020	0.940
Flex-Kleen Dust Collector System (DC-1054)	32	0.020	0.940
Flex-Kleen Dust Collector System (DC-1055)	33	0.020	0.940
Flex-Kleen Dust Collector System (DC-1056)	34	0.020	0.940
Flex-Kleen Dust Collector System (DC-1052)	35	0.020	2.130
Flex-Kleen Dust Collector System (DC-1051)	36	0.020	2.130
~~Sample Detergent Bar Soap Line~~	~~45~~	~~0.002***~~	~~0.002~~

*Combined limit for Units 14 and 15, exhausting to Stacks 16 and 17
**Combined limit for Units 21, 22 and 23, exhausting to Stack 23
~~***Emission limitation units are lbs/ton~~

All other conditions, compliance determination and monitoring requirements, record keeping and reporting requirements in Section D.3 are unaffected and unchanged.

10. On page 52 and 53 of 69, Section D.5 is deleted as follows because fatty acids are no longer used to clean dryers and the soap dryer/cleanout systems are no longer a source of emissions:

~~**SECTION D.5 FACILITY OPERATION CONDITIONS**~~

SECTION D.5 This section has been intentionally left blank.

~~**Facility Description [326 IAC 2-7-5(15)]:**~~

~~Soap Dryer/Cleanout Systems identified as follows:~~

~~a) Soap Dryer/Cleanout System Tank No. 1, identified as Unit 46, constructed in 1979, used to clean the interiors of the three (3) soap dryers in the Bar Finishing~~

Department, controlled by a mist eliminator, with a maximum amount of fatty acid recirculated of 168,000 pounds per hour and exhausting to Stack 18A.

b) Soap Dryer/Cleanout System Tank No. 2, identified as Unit 47, constructed in 1979, used to clean the interiors of the three (3) soap dryers in the Bar Finishing Department, controlled by an impingement separator, with a maximum amount of fatty acid circulated of 168,000 pounds per hour, and exhausting to Stack 19A.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)]
Pursuant to 326 IAC 6-1-10.1(d), the PM_{10} emissions from the manufacturing emission units shall not exceed the following emission limitations:

Emission Unit Description	Emission Unit ID #	PM_{10} Emission Limit (gr/dscf)	PM_{10} Emission Limit (lbs/hr)
Soap Dryer/Cleanout System Tank No. 1	46	0.030	0.390
Soap Dryer/Cleanout System Tank No. 2	47	0.030	0.300

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.5.3 Particulate Matter (PM)
The control devices shall be in operation and control emissions from these facilities at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.4 Visible Emissions Notations
(a) Visible emission notations of the Stack 18A and Stack 19A exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

~~**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**~~

~~D.5.5 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.5.4 the Permittee shall maintain daily records of visible emission notations of the stack exhausts from each facility.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

11. Page 53 of 69, has been intentionally left blank as follows:

This page has been intentionally left blank.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act IC 4-21.5-3-5. If you have any questions on this matter, please contact this Department at (219) 853-6306.

Sincerely,

Ronald Holder, Engineer
Hammond Department of Environmental Management
Air Pollution Control Division

cc: Mindy Hahn, Permits Administration, IDEM-OAM

RH

ENCLOSURES

PART 70 OPERATING PERMIT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Conopco, Inc. d/b/a Unilever HPC USA
1200 Calumet Avenue
Hammond, Indiana 46320

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6623-00229	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 19, 2002
Original Issued by: Ronald L. Novak, Director Hammond Department of Environmental Management	

First Administrative Permit Amendment: 089-15624-00229	Pages Affected: 1, 4, 5, 8-11, 43-46, 52, and 53
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: July 16, 2002

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management Office of Air Quality (IDEM-OAQ) and Hammond Department of Environmental Management (HDEM). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary soap manufacturing plant.

Responsible Official:	Plant Manager
Source Address:	1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address:	1200 Calumet Avenue, Hammond, Indiana 46320
General Source Phone Number:	(219) 659-3200
SIC Code:	2841 - Soap and Other Detergents
County Location:	Lake
Source Location Status:	Attainment for Lead, CO and NO_2, Severe Non-Attainment for Ozone and Non-Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1) Boilers, identified as follows:

a) Babcock-Wilcox Boiler No. 3, identified as Unit No. 2, constructed in 1932, with a maximum capacity of 82.4 MMBtu per hour, primarily natural gas fired with No. 6 fuel oil as an alternate fuel, and exhausting to Stack 2.

b) Babcock-Wilcox Boiler No. 4, identified as Unit No. 3, constructed in 1936, with a maximum capacity of 82.4 MMBtu per hour, primarily natural gas fired with No. 6 fuel oil as an alternate fuel, and exhausting to Stack 2.

c) American Hydrotherm Boiler No. 1, identified as Unit No. 16, constructed in 1985, with a maximum capacity of 12.22 MMBtu per hour, natural gas-fired only and exhausting to Stack 18.

d) American Hydrotherm Boiler No. 2, identified as Unit No. 29, constructed February 22, 1989, with a maximum capacity of 12.22 MMBtu per hour, primarily natural gas fired with No. 2 fuel oil as a standby fuel, and exhausting to Stack 1A.

2) Powerhouse Boiler No. 1, identified as Unit No. 49, constructed in 1995 and modified in 2001 to a maximum capacity of 120 MMBtu per hour, primarily natural gas fired with No. 2 fuel oil as a standby fuel, and exhausting to Stack 1.

3) Manufacturing Processes controlled by Dust Collector Systems, identified as follows:

a) Soap Rework Grinding Process, identified as Unit 11, constructed in 1979, controlled by a dust collection system, with a maximum capacity of 4,167 pounds per hour and exhausting to Stack 13.

b) Three (3) Vacuum System Soap Dryers, identified as Unit 12, constructed in 1979, controlled by a bag collector with a combined maximum amount of soap produced for all three dryers of 28,713 pounds per hour and exhausting to Stack 14.

c) Five (5) Noodles Bins, Two (2) Rework Systems, and One (1) Scrap Soap Kettle, identified as Unit 13, constructed in 1979, controlled by a filter bag collector with a maximum of 32,880 pounds per hour of soap handled and exhausting to Stack 15.

d) Tallow Finishing Lines 8, 9, 10, 11, 12 and 13, constructed in 1979, and re-configured in 2002, controlled by three (3) dust collectors, with a maximum design rate of 59,000 pounds per hour, and exhausting to Stack 16, 17, and 17A.

e) Soap Noodle Bin No. 1 Dust Collection System (DC-5), identified as Unit 18, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 20.

f) Soap Noodle Bin No. 2 Dust Collection System (DC-6), identified as Unit 19, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 21.

g) Soap Noodle Bin No. 3 Dust Collection System (DC-7), identified as Unit 20, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 22.

h) Chip Mixer No. 1, identified as Unit No. 21, constructed in 1985, controlled by a dust collection system (DC-8), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

i) Chip Mixer No. 2, identified as Unit No. 22, constructed in 1985, controlled by a dust collection system (DC-9), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

j) Chip Mixer Nos. 3 and 4, identified as Unit No. 23, constructed in 1985, controlled by a dust collection system (DC-10), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

k) Powder Dye Mixing System, identified as Unit 24, constructed in 1985, controlled by a dust collection system (DC-4), with a maximum capacity of 10 pounds per hour and exhausting to Stack 26.

l) Zinc Oxide Catalyst Weigh Station and three Chill Rolls (Lines 1, 2, & 3), identified as Unit 25, constructed in 1985, controlled by a dust collection system (DC-3), with a maximum design rate of soap to be processed of 18,000 pounds per hour and exhausting to Stack 27.

m) Detergent Bar Soap Facility Milling and Pelletizing, identified as Unit 26, constructed in 1985, controlled by a dust collection system (DC-1), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 28.

n) Three (3) Chill Roll Apron Conveyors and Screw Conveyors (Lines 1, 2, & 3), identified as Unit 27, constructed in 1985, controlled by a dust collection system (DC-2), with a maximum capacity of 18,000 pounds per hour and exhausting to Stack 29.

o) Flex-Kleen Dust Collector System (DC-1053), identified as Unit 31, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 3A.

p) Flex-Kleen Dust Collector System (DC-1054), identified as Unit 32, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 4A.

q) Flex-Kleen Dust Collector System (DC-1055), identified as Unit 33, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 5A.

r) Flex-Kleen Dust Collector System (DC-1056), identified as Unit 34, constructed in 1990, used to control the exhaust from a soap noodle bin, a rework feed hopper, a remelt hopper, and Detergent Bar Soap Manufacturing Line No. 5 Noodle Bin when producing product, and Line No. 4, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 6A.

s) Flex-Kleen Dust Collector System (DC-1052), identified as Unit 35, constructed in 1990, used to control the exhaust from pick-up points along Bar Soap Finishing Lines #4 and #5. Pick-up points are distributed for maximum dust reduction along the lines including plodder/extruder hoppers, duplex refiners, apron/screw conveyors, incline conveyors, pelletizing refiners, noodle hoppers, and chip mixers,

rework grinder and the TiO_2 dump station. The unit has a maximum capacity of 5,976 pounds per hour and exhausts to stack 7A.

t) Flex-Kleen Dust Collector System (DC-1051), identified as Unit 36, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausts to stack 8A.

u) No. 1 and No. 2 Noodle Bins, identified as Unit 48, constructed in 1979, controlled by a dust collector, with a maximum capacity of 10,000 pounds per hour and exhausting to Stack 46.

4) Manufacturing Processes controlled by wet scrubber systems:

a) Seven (7) liquid “Drais” mixers, two (2) reactors, and two (2) strippers (for Lines 4 through 7), identified as Unit 30, constructed in 1990, controlled by a Schneible wet scrubber and demister collection system. In case of a rupture disk failure, emissions from knockout tanks H-30675 and H-30676 will also be controlled by this system. This system also includes Line 4 melt tank and hold tank, and Lines 5, 6, and 7 melt tanks. In addition, the three (3) Holding Tanks and Melt Tanks from Lines 1, 2, & 3 are tied into this system for housekeeping purposes. The scrubber-demister system has a maximum capacity of 1,743 pounds per hour of material handled and exhausts to Stack 2A.

b) Three (3) liquid “Drais” mixers, two (2) reactors, and (2) two strippers (for Lines 1 through 3), identified as Unit 17, constructed in 1985, controlled by a Schneible wet scrubber and demister collector system. In case of a rupture disk failure, emissions from knockout tanks H-30673 and H-30674 will also be controlled by this system. System has a maximum capacity of 5,049 pounds per hour of material handled and exhausts to Stack 19.

5) This section has been intentionally left blank.

6) Storage Tank, identified as follows:

Fuel Oil Day Tank, identified as Unit 62, constructed in 2001, with a maximum design capacity of 18,000 gallons, containing No. 6 Fuel Oil with a true vapor pressure less than 0.00004 psia at 60 degrees F.

7) Sulfonation Process, including a sulfur burner, SO_2 heat exchanger, catalytic gas converter, an SO_3 heat exchanger, reactor, sulfuric acid scrubber, electrostatic precipitator, caustic scrubbing tower and a demister, identified as Unit 4, constructed in 1967, with a maximum production rate of alkyl benzene sulfonic acid of 6,500 pounds per hour and exhausting to Stack 4.

8) Preservative Addition System, identified as Unit 50, constructed in 1997, and controlled by primary and secondary filters, in which preservative powder is vacuum transferred at a maximum rate of 2,000 pounds per hour to a vacumax receiver atop a mixing tank. The preservative is mixed with perfume for subsequent addition to the soap process.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Two (2) laboratories. [326 IAC 2-7-1(21)(D)]

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour. [326 IAC 2-7-1(21)(G)(i)(BB)]

(c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 2-7-1(21)(G)(ii)(AA)]

(d) The following VOC and HAP storage containers:
A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. (Building 14 dye mixing tanks)
B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
[326 IAC 2-7-1(G)(iii)(AA)&(BB)]

(e) Production related activities, including application of oils, greases, lubricants, and nonvolatile materials as temporary protective coatings; degreasing operations that do not exceed 145 gallons per 12 months; brazing, cutting torches, soldering and welding; and closed loop heating and cooling systems.
[326 IAC 2-7-1(21)(G)(vi)(AA),(CC),(EE)&(FF)]

(f) Cleaners and solvents characterized as follows:
A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
[326 IAC 2-7-1(21)(G)(vi)(DD)]

(g) Noncontact cooling tower systems with either of the following:
Natural draft cooling towers not regulated under a NESHAP.
Forced and induced draft cooling tower system not regulated under a NESHAP.
[326 IAC 2-7-1(G)(ix)(FF)]

(h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment. [326 IAC 2-7-1(21)(G)(x)(AA)]

(i) Heat exchanger cleaning and repair. [326 IAC 2-7-1(G)(x)(BB)]

(j) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G)(xiii)]

(k) Asbestos abatement projects regulated by 326 IAC 14-10. [326 IAC 2-7-1(21)(G)(xvi)]

(l) Routine maintenance and repair of buildings. [326 IAC 2-7-1(21)(G)(xvii)]

(m) Flue gas conditioning systems and associated chemicals. [326 IAC 2-7-1(21)(G)(xviii)]

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup. [326 IAC 2-7-1(21)(G)(xix)]

(o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower. [326 IAC 2-7-1(G)(xx)(AA)-(EE)]

(p) On-site fire and emergency response training approved by the department.
[326 IAC 2-7-1(G)(xxii)(AA)]

(q) Emergency generators as follows:
Gasoline generators not exceeding 110 horsepower.
Diesel generators not exceeding 1600 horsepower.
Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
[326 IAC 2-7-1(21)(G)(xxii)(BB)]

(r) Other emergency equipment as follows:
Stationary, diesel fire pumps and rental air compressor.
[326 IAC 2-7-1(21)(G)(xxii)(CC)]

(s) Coalescer media changeout. [326 IAC 2-7-1(21)(G)(xxv)]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM-OAQ and HDEM within a reasonable time, any information that IDEM-OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM-OAQ and HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)].

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM-OAQ and HDEM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s)/position title responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM-OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM-OAQ and HDEM. IDEM-OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM-OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM-OAQ
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

HDEM
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM-OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM-OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM-OAQ and HDEM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM-OAQ or HDEM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM-OAQ or HDEM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAQ or HDEM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM-OAQ or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM-OAQ or HDEM at least

thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM-OAQ and HDEM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(40) and 326 IAC 2-7-1(21). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(2) If IDEM-OAQ and HDEM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM-OAQ and HDEM take final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM-OAQ and HDEM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM-OAQ and HDEM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2- 7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM-OAQ and HDEM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification to IDEM-OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM-OAQ, HDEM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, any records that must be kept under the conditions of this permit;

(c) Inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM-OAQ and HDEM within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM-OAQ and HDEM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.6 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM-OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM-OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM-OAQ and HDEM if the source submits to IDEM – OAQ and HDEM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Continuous Compliance Plan [326 IAC 6-1-10.1(l))]
Pursuant to 326 IAC 6-1-10.1(l) (Lake County PM10 Emission Requirements), the Permittee shall submit to IDEM and HDEM, and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6-1-10.1(p) through (r) or according to the Permittee's CCP.

C.14 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D

of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality-assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.15 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3) [326 IAC 2-7-6(1)

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM-OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 2, 2001.

(b) If the ERP is disapproved by IDEM-OAQ, and HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) Upon direct notification by IDEM-OAQ, and HDEM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.19 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM-OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM-OAQ and HDEM within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM-OAQ and HDEM that retesting in one-hundred and twenty (120) days is not practicable, IDEM-OAQ and HDEM may extend the retesting deadline.

(c) IDEM-OAQ and HDEM reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated emissions of other regulated pollutants (as defined by 326 IAC 2- 7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Boilers, identified as follows:

a) Babcock-Wilcox Boiler No. 3, identified as Unit No. 2, constructed in 1932, with a maximum capacity of 82.4 MMBtu per hour, primarily natural gas fired with No. 6 fuel oil as an alternate fuel, and exhausting to Stack 2.

b) Babcock-Wilcox Boiler No. 4, identified as Unit No. 3, constructed in 1936, with a maximum capacity of 82.4 MMBtu per hour, primarily natural gas fired with No. 6 fuel oil as an alternate fuel, and exhausting to Stack 2.

c) American Hydrotherm Boiler No. 1, identified as Unit No. 16, constructed in 1985, with a maximum capacity of 12.22 MMBtu per hour, natural gas-fired only and exhausting to Stack 18.

d) American Hydrotherm Boiler No. 2, identified as Unit No. 29, constructed February 22, 1989, with a maximum capacity of 12.22 MMBtu per hour, primarily natural gas fired with No. 2 fuel oil as a standby fuel, and exhausting to Stack 1A.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)]
Pursuant to 326 IAC 6-1-10.1(d), the PM and PM_{10} emissions from the boilers shall not exceed the pounds per hour emission rate or the pounds per million Btu limits as follows:

Emission Unit Description	Emission Unit ID #	Emission Limit (lbs/MMBtu)	Emission Limit (lbs/hr)
Babcock-Wilcox Boiler #3 & #4	2 & 3	0.116*	18.88*
American Hydrotherm Boiler No. 2	29	0.150	1.830

*Combined limit for Boilers 3 & 4

D.1.2 Particulate Matter less than 10 microns (PM_{10}) Lake Country Rule [326 IAC 6-1-10.1(h)]
Pursuant to 6-1-10.1(h) the American Hydrotherm Boiler No. 1, Unit 16, shall fire natural gas only and shall not exceed 0.003 pounds per MMBtu heat input rate or 0.040 pounds per hour while combusting fuel.

D.1.3 Sulfur Dioxide (SO_2) [326 IAC 7-4-1.1(c)(13)]
Pursuant to 326 IAC 7-4-1.1(c)(13) (SO_2 Emissions Limitations), the following sources shall not exceed the SO_2 emissions in pounds per million Btu:

Emission Unit Description	Emission Unit ID #	SO_2 Emission Limit (lbs/mmBtu)
Babcock-Wilcox Boiler #3	2	1.52
Babcock-Wilcox Boiler #4	3	1.52

D.1.4 Sulfur Dioxide (SO_2) [326 IAC 7-4-1.1(a)]
Pursuant to 326 IAC 7-4-1.1(a) (SO_2 Emissions Limitations), the SO_2 emissions from American Hydrotherm Boiler No. 2 shall not exceed three-tenths (0.3) pound per million Btu (lb/MMBtu) heat input while combusting fuel oil.

D.1.5 Sulfur Dioxide (SO_2) [Hammond Ordinance No. 3522]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the sulfur content by weight of the fuel oil burned shall be limited as follows:

Emission Unit Description	Emission Unit ID #	Maximum Sulfur Content by Weight
Babcock-Wilcox Boiler #3	2	1.43%
Babcock-Wilcox Boiler #4	3	1.43%
American Hydrotherm Boiler #2	29	0.5%

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.7 Sulfur Dioxide Emissions and Sulfur Content
Compliance with Conditions D.1.3 and D.1.4 shall be determined utilizing one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the limited heat input in Conditions D.1.3 and D.1.4 by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the facilities using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the boilers stack exhausts shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3 through D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO_2 emission limit established in Conditions D.1.3 and D.1.4.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration

and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the Stacks 18, 2, and 3 exhaust while combusting fuel oil.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

(a) A natural gas-fired boiler certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34);

(b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

(c) A semi-annual summary of the information to document compliance with Conditions D.1.1 through D.1.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Powerhouse Boiler No. 1, identified as Unit No. 49, constructed in 1995 and modified in 2001 to a maximum capacity of 120 MMBtu per hour, primarily natural gas fired with No. 2 fuel oil as a standby fuel, and exhausting to Stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD and Emission Offset Minor Limit [326 IAC 2-2 and 326 IAC 2-3]
The oil usage for Powerhouse Boiler No. 1 shall not exceed 600 thousand gallons (mgal) of No. 2 fuel oil per 365 consecutive day period. This limitation is equivalent to a potential to emit twenty-five (25) tons of NO_X per year when natural gas is used for the remainder of the 365 consecutive day period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD) not applicable.

D.2.2 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart Db] [326 IAC 6-1-2] [326 IAC 7-1.1]
Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), emissions from Powerhouse Boiler No. 1 shall not exceed the following:

(a) Five-hundredths (0.05) pound PM per million Btu (MMBtu) heat input.

(b) Twenty percent (20%) opacity except for one six-minute period per hour of not more than twenty-seven (27%) opacity.

(c) Five-tenths (0.5) pound SO_2 per million Btu (MMBtu) heat input and 90% reduction in SO_2 emissions.

(d) Two-tenths (0.20) pound NO_X per million Btu (MMBtu) heat input.

Compliance with this limitation shall satisfy the PM and SO_2 requirements of 326 IAC 6-1-2 and 326 IAC 7-1.1, respectively.

D.2.3 Particulate Matter (PM) [326 IAC 6-1-2]
Pursuant to 326 IAC 6-1-2(b)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Powerhouse Boiler No. 1 shall be limited to 0.01 grain per dry standard cubic foot (natural gas) and 0.15 lb/MMBtu (fuel oil).

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
Performance testing shall be conducted in accordance with 40 CFR 60.7 and 60.8. IDEM, OAQ may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, OAQ or HDEM, compliance with the limits specified in Conditions D.2.1 through D.2.2 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

D.2.6 NSPS Compliance Provisions [326 IAC 12] [40 CFR 60, Subpart Db]

(a) The PM and opacity emission limitations in Condition D.2.2 apply at all times, except during periods of startup, shutdown or malfunction.

(b) The SO_2 and NO_X emission limitations in Condition D.2.2 apply at all times, including periods of startup, shutdown, and malfunction.

(c) Compliance with the SO_2 emission limitation and percent reduction in Condition D.2.2 shall be determined by the use of “very low sulfur oil” in accordance with 40 CFR 60.42b(j).

(d) Compliance with the PM and opacity emission limitations in Condition D.2.2 shall be determined by the methods and procedures specified in 40 CFR 60.46b(d).

(e) Compliance with the NO_X emission limitation in Condition D.2.2 shall be determined by the methods and procedures specified in 40 CFR 60.46b(e).

D.2.7 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 7-1.1-2(a)(3)]
Compliance with the sulfur dioxide emission limitations and content limitations in Condition D.2.2 shall be determined by maintaining the fuel receipts in accordance with 40 CFR 60.49b(r) to demonstrate that the oil meets the definition of “very low sulfur oil” in 40 CFR 60.41b.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

(a) Visible emission notations of the exhaust from Stack 1 shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.9 Preventive Inspections

(a) The following inspections shall be performed at least once every two years in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

(1) Start-up and shutdown practices; and
(2) Spare parts availability.

(b) Inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past twelve months.

(c) Appropriate response steps for any discrepancies in the above list found during the inspection shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the NO_X and SO_2 emission limits established in Conditions D.2.1 and D.2.2.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(b) To document compliance with Condition D.2.1, the Permittee shall maintain daily records of the quantity in gallons of #2 fuel oil burned.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of visible emission notations of the Stack 1 exhaust while combusting fuel oil.

(d) To document compliance with Condition D.2.9, the Permittee shall maintain records of inspections as specified in Condition D.2.9 (b).

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

(a) A quarterly summary of the quantity of fuel oil burned to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Manufacturing Processes controlled by Dust Collector Systems, identified as follows:

a) Soap Rework Grinding Process, identified as Unit 11, constructed in 1979, controlled by a dust collection system, with a maximum capacity of 4,167 pounds per hour and exhausting to Stack 13.

b) Three (3) Vacuum System Soap Dryers, identified as Unit 12, constructed in 1979, controlled by a bag collector with a combined maximum amount of soap produced for all three dryers of 28,713 pounds per hour and exhausting to Stack 14.

c) Five (5) Noodles Bins, Two (2) Rework Systems, and One (1) Scrap Soap Kettle, identified as Unit 13, constructed in 1979, controlled by a filter bag collector with a maximum of 32,880 pounds per hour of soap handled and exhausting to Stack 15.

d) Tallow Finishing Lines 8, 9, 10, 11, 12 and 13, constructed in 1979, and re-configured in 2002, controlled by three (3) dust collectors, with a maximum design rate of 59,000 pounds per hour, and exhausting to Stacks 16, 17, and 17A.

e) Soap Noodle Bin No. 1 Dust Collection System (DC-5), identified as Unit 18, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 20.

f) Soap Noodle Bin No. 2 Dust Collection System (DC-6), identified as Unit 19, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 21.

g) Soap Noodle Bin No. 3 Dust Collection System (DC-7), identified as Unit 20, constructed in 1985, used to control soap dust from the transfer of soap noodles or pellets via an air conveyor system to Noodle Bins No. 1, 2, 3, or 4 (connected to a common header), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 22.

h) Chip Mixer No. 1, identified as Unit No. 21, constructed in 1985, controlled by a dust collection system (DC-8), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

i) Chip Mixer No. 2, identified as Unit No. 22, constructed in 1985, controlled by a dust collection system (DC-9), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

j) Chip Mixer Nos. 3 and 4, identified as Unit No. 23, constructed in 1985, controlled by a dust collection system (DC-10), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 23.

k) Powder Dye Mixing System, identified as Unit 24, constructed in 1985, controlled by a dust collection system (DC-4), with a maximum capacity of 10 pounds per hour and exhausting to Stack 26.

l) Zinc Oxide Catalyst Weigh Station and three Chill Rolls (Lines 1, 2, & 3), identified as Unit 25, constructed in 1985, controlled by a dust collection system (DC-3), with a maximum design rate of soap to be processed of 18,000 pounds per hour and exhausting to Stack 27.

m) Detergent Bar Soap Facility Milling and Pelletizing, identified as Unit 26, constructed in 1985, controlled by a dust collection system (DC-1), with a maximum capacity of 23,625 pounds per hour and exhausting to Stack 28.

n) Three (3) Chill Roll Apron Conveyors and Screw Conveyors (Lines 1, 2, & 3), identified as Unit 27, constructed in 1985, controlled by a dust collection system (DC-2), with a maximum capacity of 18,000 pounds per hour and exhausting to Stack 29.

o) Flex-Kleen Dust Collector System (DC-1053), identified as Unit 31, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 3A.

p) Flex-Kleen Dust Collector System (DC-1054), identified as Unit 32, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 4A.

q) Flex-Kleen Dust Collector System (DC-1055), identified as Unit 33, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 5A.

r) Flex-Kleen Dust Collector System (DC-1056), identified as Unit 34, constructed in 1990, used to control the exhaust from a soap noodle bin, a rework feed hopper, a remelt hopper, and Detergent Bar Soap Manufacturing Line No. 5 Noodle Bin when producing product, and Line No. 4, with a maximum capacity of 5,976 pounds per hour and exhausting to stack 6A.

s) Flex-Kleen Dust Collector System (DC-1052), identified as Unit 35, constructed in 1990, used to control the exhaust from pick-up points along Bar Soap Finishing Lines #4 and #5. Pick-up points are distributed for maximum dust reduction along the lines including plodder/extruder hoppers, duplex refiners, apron/screw conveyors, incline conveyors, pelletizing refiners, noodle hoppers, and chip mixers, rework grinder and the TiO2 dump station. The unit has a maximum capacity of 5,976 pounds per hour and exhausts to stack 7A.

t) Flex-Kleen Dust Collector System (DC-1051), identified as Unit 36, originally constructed in 1990, and modified in 2001 to be part of a dust collector header system integrating dust collectors DC-1051, DC-1053, DC-1054, and DC-1055. The dust collector header collects dust from the soap noodle bins, rework feed hoppers, re-melt hoppers and other miscellaneous pick-up points associated with maintenance clean up, with a maximum capacity of 5,976 pounds per hour and exhausts to stack 8A.

u) No. 1 and No. 2 Noodle Bins, identified as Unit 48, constructed in 1979, controlled by a dust collector, with a maximum capacity of 10,000 pounds per hour and exhausting to Stack 46.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [Hammond Ordinance No. 3522]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), PM emissions from the Zinc Oxide Catalyst Weigh Station, Unit 25, shall not exceed 0.021 pounds per hour or 0.092 tons per year; PM emissions from the Detergent Bar Soap Facility Milling and Pelletizing, Unit 26, shall not exceed 0.79 pounds per hour or 3.45 tons per year; and PM emissions from the No.1 & No. 2 Noodle Bins, Unit 48, shall not exceed 0.006 pounds per hour or 0.0263 tons per year.

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.3.2 Particulate Matter (PM10) Limit [Hammond Ordinance No. 3522]
Pursuant to Hammond Ordinance No. 3522, PM10 emissions from the No. 1 and No. 2 Noodle Bins, Unit 48, shall not exceed 0.0042 pounds per hour or 0.0184 tons per year.

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.3.3 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)]
Pursuant to 326 IAC 6-1-10.1(d), the PM_{10} emissions from the manufacturing emission units shall not exceed the following emission limitations:

Emission Unit Description	Emission Unit ID #	PM_{10} Emission Limit (gr/dscf)	PM_{10} Emission Limit (lbs/hr)
Soap Rework Grinding Process	11	0.020	0.250
Three (3) Vacuum System Soap Dryers	12	0.020	0.120
Five (5) Noodles Bins, Two (2) Rework Systems, and One (1) Scrap Soap Kettle	13	0.020	0.860
Tallow Finishing Lines 8, 9, 10, 11, 12 and 13	14/15	0.020*	1.540*
Soap Noodle Bin No. 1 Dust Collection System	18	0.020	0.210
Soap Noodle Bin No. 2 Dust Collection System	19	0.020	0.210
Soap Noodle Bin No. 3 Dust Collection System	20	0.020	0.210
Chip Mixer No. 1	21	0.020**	0.720**
Chip Mixer No. 2	22	0.020**	0.720**
Chip Mixer No. 3 and 4	23	0.020**	0.720**
Powder Dye Mixing System	24	0.020	0.130
Zinc Oxide Catalyst Weigh Station and Three Chill Rolls	25	0.020	0.800
Detergent Bar Soap Facility Milling and Pelletizing	26	0.020	1.03
Three (3) Chill Roll Apron Conveyors and Screw Conveyors	27	0.020	1.090
Flex-Kleen Dust Collector System (DC-1053)	31	0.020	0.940
Flex-Kleen Dust Collector System (DC-1054)	32	0.020	0.940
Flex-Kleen Dust Collector System (DC-1055)	33	0.020	0.940
Flex-Kleen Dust Collector System (DC-1056)	34	0.020	0.940
Flex-Kleen Dust Collector System (DC-1052)	35	0.020	2.130
Flex-Kleen Dust Collector System (DC-1051)	36	0.020	2.130

*Combined limit for Units 14 and 15, exhausting to Stacks 16 and 17
**Combined limit for Units 21, 22 and 23, exhausting to Stack 23

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
Within 36 months after issuance of this permit, a performance test shall be conducted for Units 11, 12, 13, 14, 18, 21, 26, and 27 in order to demonstrate compliance with Conditions D.3.2 and D.3.3. The Permittee shall perform PM-10 testing utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C – Performance Testing.

D.3.6 Particulate Matter (PM)
The dust collection systems for PM control shall be in operation and control emissions from these facilities at all times when the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Visible Emissions Notations

(a) Visible emission notations of the stack exhausts from these facilities shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the manufacturing processes, at least once weekly when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across each baghouse is outside the normal range of 1.0 and 8.0 inches of water, a range established during the latest stack test or as recommended by the equipment manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM – OAQ and HDEM and shall be calibrated at least once every six (6) months.

D.3.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the manufacturing processes when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the

timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements

(a) To document compliance with Condition D.3.7, the Permittee shall maintain records of daily visible emission notations of the stack exhaust from each facility.

(b) To document compliance with Condition D.3.8, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.9, the Permittee shall maintain records of the results of inspections required under Condition D.3.9 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Manufacturing Processes controlled by wet scrubber systems:

a) Seven (7) liquid "Drais" mixers, two (2) reactors, and two (2) strippers (for Lines 4 through 7), identified as Unit 30, constructed in 1990, controlled by a Schneible wet scrubber and demister collection system. In case of a rupture disk failure, emissions from knockout tanks H-30675 and H-30676 will also be controlled by this system. This system also includes Line 4 melt tank and hold tank, and Lines 5, 6, and 7 melt tanks. In addition, the three (3) Holding Tanks and Melt Tanks from Lines 1, 2, & 3 are tied into this system for housekeeping purposes. The scrubber-demister system has a maximum capacity of 1,743 pounds per hour of material handled and exhausts to Stack 2A.

b) Three (3) liquid "Drais" mixers, two (2) reactors, and (2) two strippers (for Lines 1 through 3), identified as Unit 17, constructed in 1985, controlled by a Schneible wet scrubber and demister collector system. In case of a rupture disk failure, emissions from knockout tanks H-30673 and H-30674 will also be controlled by this system. System has a maximum capacity of 5,049 pounds per hour of material handled and exhausts to Stack 19.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)]
Pursuant to 326 IAC 6-1-10.1(d), the PM_{10} emissions from the manufacturing emission units shall not exceed the following emission limitations:

Emission Unit Description	Emission Unit ID #	PM_{10} Emission Limit (gr/dscf)	PM_{10} Emission Limit (lbs/hr)
Schneible Wet Scrubber controlling seven (7) liquid "Drais" mixers, two (2) reactors, and two (2) strippers	30	0.030	1.030
Schneible Wet Scrubber controlling three (3) liquid "Drais" mixers, two (2) reactors, and (2) two strippers	17	0.030	1.030

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.4.3 Particulate Matter (PM)
The wet scrubber collector system for PM control shall be in operation and control emissions from these facilities at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Visible Emissions Notations

(a) Visible emission notations of the exhaust from Stacks 2A and 19 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.5 Parametric Monitoring

The Permittee shall record the flow rate and total static pressure drop across each scrubber used in conjunction with Units 30 and 17 at least once daily when in operation. When for any one reading, the pressure drop across the scrubbers is outside the normal range of 5.0 and 10.0 inches of water, a range established during the latest stack test or as recommended by the equipment manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.6 Scrubber Inspections

An inspection shall be performed each calendar quarter of all scrubbers controlling these facilities. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.

D.4.7 Scrubber Failure Detection

In the event that a scrubber's failure has been observed:

(a) The affected unit will be shut down immediately until the failed unit has been replaced.

(b) Based upon the confirmed findings of an inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.4 the Permittee shall maintain daily records of visible emission notations of the stack exhausts from each facility.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure;

(B) Air to water ratio; and

(C) Flow rate.

(c) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of inspections.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 **This section has been intentionally left blank**

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SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Storage Tank, identified as follows:

Fuel Oil Day Tank, identified as Unit 62, constructed in 2001, with a maximum design capacity of 18,000 gallons, containing No. 6 Fuel Oil with a true vapor pressure less than 0.00004 psia at 60 degrees F.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOCs) [326 IAC 8-9]
Pursuant to 326 IAC 8-9-1, stationary vessels used to store volatile organic liquid (VOL) that are located in Lake County and have a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.

Any change or modification to this facility that would increase potential volatile organic compound (VOC) emissions, as specified in 326 IAC 2-1, must be approved by the Office of Air Quality (OAQ) and HDEM before such change or modification can occur.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.2 Monitoring
Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.3 Record Keeping Requirements
Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

(a) The vessel identification number.
(b) The vessel dimensions.
(c) The vessel capacity.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Sulfonation Process, including a sulfur burner, SO_2 heat exchanger, catalytic gas converter, an SO_3 heat exchanger, reactor, sulfuric acid scrubber, electrostatic precipitator, caustic scrubbing tower and a demister, identified as Unit 4, constructed in 1967, with a maximum production rate of alkyl benzene sulfonic acid of 6,500 pounds per hour and exhausting to Stack 4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter less than 10 microns (PM_{10}) Lake County Rule [326 IAC 6-1-10.1(d)]
Pursuant to 326 IAC 6-1-10.1(d), the PM_{10} emissions from the Sulfonation Process shall not exceed 0.205 pounds per ton of material processed or 0.390 pounds per hour.

D.7.2 Sulfur Dioxide (SO_2) [326 IAC 7-4-1.1]
Pursuant to 326 IAC 7-4-1.1(c)(13) (SO_2 Emissions Limitations), the SO_2 emissions from the Sulfonation Process shall not exceed 3.1 pounds per ton of material processed or 10.075 pounds per hour.

D.7.3 Sulfuric Acid (H_2SO_4) Mist Limit [Hammond Ordinance No. 3522]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), H_2SO_4 emissions from the Sulfonation Process shall not exceed 0.052 pounds per hour or 0.228 tons per year.

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.7.5 Emissions Control
The sulfuric acid scrubber and electrostatic precipitator shall be in operation and control emissions from the Sulfonation Process at all times that the facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.6 Visible Emissions Notations
(a) Visible emission notations of the Sulfonation stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.7 Parametric Monitoring

(a) The Permittee shall monitor the amperage on the fan motor of the electrostatic precipitator used in conjunction with the Sulfonation Process, at least once daily when the process is in operation. The Compliance Response Plan for this unit shall contain troubleshooting and response steps for when the amperage is outside of the normal range as recommended by the manufacturer.

(b) The Permittee shall record the flow rate and total static pressure drop across each scrubber used in conjunction with this facility at least once daily when in operation. When for any one reading, the pressure drop across the scrubbers is outside the normal range of 5.0 and 10.0 inches of water, a range established during the latest stack test or as recommended by the equipment manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.8 Electrostatic Precipitator Inspections

An inspection shall be performed each calendar quarter of the electrostatic precipitator controlling this facility. Confirmed defective electrostatic precipitator part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of electrostatic precipitator part(s) replaced.

D.7.9 Electrostatic Precipitator Failure Detection

In the event that an electrostatic precipitator 's failure has been observed:

(a) The affected unit will be shut down immediately until the failed unit has been replaced.

(b) Based upon the confirmed findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.7.10 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubber controlling this facility. Confirmed defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.

D.7.11 Scrubber Failure Detection

In the event that a scrubber's failure has been observed:

(a) The affected unit will be shut down immediately until the failed unit has been replaced.

(b) Based upon the confirmed findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.7.12 Demister Inspections

An inspection shall be performed each calendar quarter of the demister controlling the Sulfonation Process. Confirmed defective part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of demister part(s) replaced.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.13 Record Keeping Requirements

(a) To document compliance with Condition D.7.6, the Permittee shall maintain daily records of visible emission notations of the stack exhaust.

(b) To document compliance with Condition D.7.7, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure;

(B) Air to water ratio; and

(C) Flow rate.

(c) To document compliance with Conditions D.7.8 and D.7.10, the Permittee shall maintain records of the results of inspections.

(d) Pursuant to Operating Permit No. 01688 and to document compliance with Condition D.7.12, the Permittee shall maintain records of the following:

(1) All regular and emergency maintenance work performed on the demister;
(2) Inspections of the different components of this unit;
(3) Weekly activation of the spray nozzles for cleaning of the mesh pad; and
(4) Annual inspections of the interior parts of the demister.

(e) Pursuant to Operating Permit No. 01688, the Permittee shall record and maintain a log of Sulfonation Process Cold Shutdown(s)/Start-Up(s) as follows:

(1) The Permittee shall notify HDEM at least one week prior to a cold shutdown (total plant shutdown for planned maintenance) of the Sulfonation Process. The notification shall include the anticipated date and time of start-up after the said cold shutdown.

(2) The Permittee shall notify HDEM at least 24-hours prior to starting up after a cold shutdown.

(3) The Permittee shall record and maintain a log of Sulfonation Process operating status including the date and times.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Preservative Addition System, identified as Unit 50, constructed in 1997, and controlled by primary and secondary filters, in which preservative powder is vacuum transferred at a maximum rate of 2,000 pounds per hour to a vacumax receiver atop a mixing tank. The preservative is mixed with perfume for subsequent addition to the soap process.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) Limit [Hammond Ordinance No. 3522]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), PM emissions from the Preservative Addition System shall not exceed 0.020 pounds per hour or 0.088 tons per year.

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.8.2 Particulate Matter (PM10) Limit [Hammond Ordinance No. 3522]
Pursuant to Hammond Air Quality Control Ordinance No. 3522 (as amended), PM10 emissions from the Preservative Addition System shall not exceed 0.017 pounds per hour or 0.0745 tons per year.

These local limits are not state or federally enforceable. They are only enforceable by HDEM.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

a) Two (2) laboratories.

b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

d) The following VOC and HAP storage containers:
   A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. (Building 14 dye mixing tanks)
   B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

e) Production related activities, including application of oils, greases, lubricants, and nonvolatile materials as temporary protective coatings; degreasing operations that do not exceed 145 gallons per 12 months; brazing, cutting torches, soldering and welding; and closed loop heating and cooling systems.

f) Cleaners and solvents characterized as follows:
   A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
   B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

g) Noncontact cooling tower system with either of the following:
Natural draft cooling towers not regulated under a NESHAP.
Forced and induced draft cooling tower system not regulated under a NESHAP.

h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

i) Heat exchanger cleaning and repair.

j) Paved and unpaved roads and parking lots with public access.

k) Asbestos abatement projects regulated by 326 IAC 14-10.

l) Routine maintenance and repair of buildings.

m) Flue gas conditioning systems and associated chemicals.

n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup.

o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

p) On-site fire and emergency response training approved by the department.

q) Emergency generators as follows:
Gasoline generators not exceeding 110 horsepower.
Diesel generators not exceeding 1600 horsepower.
Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

r) Other emergency equipment as follows:
Stationary, diesel fire pumps and rental air compressor.

s) Coalescer media changeout.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.9.**2** Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight (38) degrees Celsius (one hundred (100) degrees Fahrenheit);

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight (38) degrees Celsius (one hundred (100) degrees Fahrenheit), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight (38) degrees Celsius (one hundred (100) degrees Fahrenheit), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility without remote solvent reservoirs existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties shall ensure that the following requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.9.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers) users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Clark, Floyd, Lake, and Porter Counties, except for solvents intended to be used to clean electronic components, shall ensure that the following requirements are met:

(a) Material requirements are phased in as follows:

(1) On and after May 1, 2001, no person shall do the following:

(A) Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) On and after November 1, 1999, the following record keeping requirements shall be followed:

(1) All persons subject to the requirements of subsection (a)(1)(A) shall maintain each of the following records for each purchase:

(A) The name and address of the solvent supplier.
(B) The date of purchase.
(C) The type of solvent.
(D) The volume of each unit of solvent.
(E) The total volume of the solvent.
(F) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) All records required by subsection (b) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: **Conopco, Inc. d/b/a Unilever HPC USA**
Source Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Part 70 Permit No.: **T089-6623-00229**

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

5925 Calumet Avenue, Room 304
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343

PART 70 OPERATING PERMIT

EMERGENCY OCCURRENCE REPORT

Source Name: **Conopco, Inc. d/b/a Unilever HPC USA**
Source Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Part 70 Permit No.: **T089-6623-00229**

This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected: Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT
QUARTERLY NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: **Conopco, Inc. d/b/a Unilever HPC USA**
Source Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Part 70 Permit No.: **T089-6623-00229**

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

☐ **Natural Gas Only**

☐ **Alternate Fuel Burned**
From: _____ **To:** _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Part 70 Quarterly Report

Source Name: **Conopco, Inc. d/b/a Unilever HPC USA**
Source Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Part 70 Permit No.: T089-6623-00229
Facility: Powerhouse Boiler #1
Parameter: Fuel Oil #2 Usage
Limit: Synthetic Minor Limitation of Fuel Oil #2 Usage for NOx emissions. Total fuel oil usage shall not exceed 600,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. This limitation is equivalent to a potential to emit twenty-five (25) tons of NOx per year when natural gas is used for the remainder of the year.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

_ No deviation occurred in this quarter.

_ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: **Conopco, Inc. d/b/a Unilever HPC USA**
Source Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Mailing Address: 1200 Calumet Avenue, Hammond, Indiana 46320
Part 70 Permit No.: **T089-6623-00229**

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Permit Requirement (Specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (Specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (Specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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Permit Requirement (Specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (Specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

Appendix A: Emissions Calculations Before Modification (Restoration)
Existing Equipment

First Administrative Amendment
089-15624-00229

Unilever HPC USA
1200 CALUMET AVENUE
HAMMOND, IN 46320

PLANT ID NO: **T089-6623-00229**
INSP DATE: 10/29/02
CALC DATE: 6/14/02

CALCULATIONS BY: Ronald Holder

YEAR OF DATA: **review**

NO. OF POINTS: 6

NOTES
EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

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P13; S1: **Five (5) Noodle Bins &**
One (1) Scrap Soap Kettle DC Sys
Stack 15, Bldg 14

MDR (T/hr): 16.44
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): 1.0' : 60'
FLOWRATE (ACFM): 5,000
Ts(°F): 77

CNTRL DEV: AMERICAN AIR FILTER
BAG COLLECTOR (99.9% CE)
SCC NO. 3-01-009-99

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						**ALLOWABLE**	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	26	0.999	429.0	10296.0	**1879.0**	0.43	**1.88**	0.010	0	0
PM10	18.27	0.999	300.3	7207.2	**1315.3**	0.30	**1.32**	0.007	**0.860**	**3.77**
SOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
NOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
VOC	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
CO	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
LEAD	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

P14; S1: **Hard Soaps Finishing Lines 1, 2, & 3** MDR (T/hr): 14.71 STACK ID (DIAM:HEIGHT): 1.33' : 89'

Stack 16, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 4,500

CNTRL DEV: Seneca Dust Collector @ 99.9% CE Ts(°F): 70

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	19.2	0.999	282.5	6779.5	**1237.3**	0.28	**1.24**	0.007	0	0
PM10	13.44	0.999	197.7	4745.7	**866.1**	0.20	**0.87**	0.005	**see**	**below**
SOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
NOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
VOC	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
CO	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
LEAD	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

P15; S1: **Hard Soaps Finishing Lines 5, 7, & 8** MDR (T/hr): 14.71 STACK ID (DIAM:HEIGHT): 1.33' : 89'

Stack 17, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 4,500

CNTRL DEV: Seneca Dust Collector @ 99.9% CE Ts(°F): 70

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	19.2	0.999	282.5	6779.5	**1237.3**	0.28	**1.24**	0.007	0	0
PM10	13.44	0.999	197.7	4745.7	**866.1**	0.20	**0.87**	0.005	**1.540**	**6.75**
SOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
NOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
VOC	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
CO	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
LEAD	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

*** Combined limit for Stacks 16 & 17.**

P45; S1: **Sample Detergent Bar Soap Line** MDR (T/hr): 0.844 STACK ID (DIAM:HEIGHT): 1.25' : 96.96'

Stack 17A, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 2,350

CNTRL DEV: TORIT DUST COLLECTOR Ts(°F): 70

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	2.37	0.999	2.0	48.0	**8.8**	0.002	**0.01**	0.0001	0	0
PM10	1.66	0.999	1.4	33.6	**6.1**	0.001	**0.01**	0.0001	**0.002**	**0.0088**
SOx	0	0	0.0	0.0	**0.0**	0.000	**0.00**	N/A	0	0
NOx	0	0	0.0	0.0	**0.0**	0.000	**0.00**	N/A	0	0
VOC	0	0	0.0	0.0	**0.0**	0.000	**0.00**	N/A	0	0
CO	0	0	0.0	0.0	**0.0**	0.000	**0.00**	N/A	0	0
LEAD	0	0	0.0	0.0	**0.0**	0.000	**0.00**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

P46; S1: **Soap Dryer Cleanout System, Tank #1** MDR (T/hr): 84 STACK ID (DIAM:HEIGHT): 1' : 90.75'

Stack 18A, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 1,500

CNTRL DEV: FLEXI-CHEVRON MIST ELIMINATOR Ts(°F): 212

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	0.003	0.99	0.25	6.00	**1.10**	0.003	**0.011**	0.0002	0	0
PM10	0.003	0.99	0.25	6.00	**1.10**	0.003	**0.011**	0.0002	**0.390**	**1.71**
SOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
NOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
VOC	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
CO	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
LEAD	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

P47; S1: **Soap Dryer Cleanout System, Tank #2** MDR (T/hr): 84 STACK ID (DIAM:HEIGHT): 1' : 90.75'

Stack 19A, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 1,500

CNTRL DEV: IMPINGEMENT SEPARATOR Ts(°F): 212

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	0.010	0.99	0.86	20.64	**3.77**	0.009	**0.038**	0.0008	0	0
PM10	0.010	0.99	0.86	20.64	**3.77**	0.009	**0.038**	0.0008	**0.300**	**1.31**
SOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
NOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
VOC	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
CO	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
LEAD	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

Emissions Totals Before Modification (Restoration)

Existing Equipment

	POTENTIAL EMISSIONS			ALLOWABLE	
	BEFORE CONTROLS	AFTER CONTROLS			
	(TPY)	(lbs/hr)	(TPY)	(lbs/hr)	(TPY)
PM	**4,367**				
PM10	**3,058**	**0.71**	**3.10**	**3.09**	**13.54**

Total PM10 SIP Limitation
326 IAC 6-1-10.1(d)

Appendix A: Emissions Calculations After Modification (Restoration)
Existing Equipment, upgrades, modifications, and removals

First Administrative Amendment
089-15624-00229

Unilever HPC USA
1200 CALUMET AVENUE
HAMMOND, IN 46320

PLANT ID NO: **T089-6623-00229**
INSP DATE: 10/29/02
CALC DATE: 6/13/02

CALCULATIONS BY: Ronald Holder

YEAR OF DATA: **review**

NO. OF POINTS: 4

NOTES
EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

****

P13; S1: **Five (5) Noodle Bins, Two Rework Systems, and One (1) Scrap Soap Kettle Stack 15, Bldg 14**

MDR (T/hr): 16.44
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): 1.0' : 60'
FLOWRATE (ACFM): **6,400**
Ts(°F): 77

CNTRL DEV: AMERICAN AIR FILTER
BAG COLLECTOR (99.9% CE)

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-01-009-99

			POTENTIAL EMISSIONS						**ALLOWABLE**	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	26	0.999	429.0	10296.0	**1879.0**	0.43	**1.88**	0.008	0	0
PM10	18.27	0.999	300.3	7207.2	**1315.3**	0.30	**1.32**	0.006	**0.860**	**3.77**
SOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
NOx	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
VOC	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
CO	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0
LEAD	0	0	0.0	0.0	**0.0**	0.00	**0.00**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

1. **Add two (2) soap rework systems, one existing, moved from another part of the plant, and one new.**
   These rework systems recycle soap dust back into the process and exhaust to the existing dust collector.
2. **No change in the maximum design rate or potential emissions.**
3. **Current SIP limit (allowable emissions) remains the same. This stack is scheduled for testing per the current Part 70 permit.**
4. **The airflow will be increased to handle the new dust pick-up points.**

P14; S1: **Tallow Finishing Lines 8,9,10,11,12, and 13**
P15; S1: **Stacks 16,17, and 17A, Bldg. 14**
P45; S1:
CNTRL DEV: Two (2) Seneca Dust Collectors
One (1) Torit Dust Collector
99.9% CE each

MDR (T/hr): 29.50
YEARLY PROD (T/yr): N/A

Stacks 16 and 17 each
STACK ID (DIAM:HEIGHT): 1.33' : 89'
FLOWRATE (ACFM): 4,500
Ts(°F): 70

Stack 17A
STACK ID (DIAM:HEIGHT): 1.25' : 97'
FLOWRATE (ACFM): 2,350
Ts(°F): 70

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-01-009-99

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	19.2	0.999	566.4	13593.6	**2480.8**	0.57	**2.48**	0.015	0	0
PM10	13.44	0.999	396.5	9515.5	**1736.6**	0.40	**1.74**	0.010	**1.542**	**6.75**
SOx	0	0	0	0	**0**	0	**0**	N/A	0	0
NOx	0	0	0	0	**0**	0	**0**	N/A	0	0
VOC	0	0	0	0	**0**	0	**0**	N/A	0	0
CO	0	0	0	0	**0**	0	**0**	N/A	0	0
LEAD	0	0	0	0	**0**	0	**0**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

*** Combined limit for Stacks 16 & 17 = 1.54 lbs/hr.**

*** PM10 limit for Stack 17A = 0.002 lbs/hr.**

1. **Combines Hard Soap Finishing Lines 1, 2, & 3, Hard Soap Finishing Lines 5, 7, & 8, and the Sample Detergent Bar Soap Line**
2. **Dust Collectors and Stacks 16, 17, and 17A, remain the same. SIP limits (allowables) remain the same.**
3. **Stack 16 is scheduled for testing per the current Part 70 permit.**

P46; S1: **Soap Dryer Cleanout System, Tank #1**
Stack 18A, Bldg. 14
CNTRL DEV: FLEXI-CHEVRON MIST ELIMINATOR

MDR (T/hr): 84
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): 1' : 90.75'
FLOWRATE (ACFM): 1,500
Ts(°F): 212

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-01-009-99

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	**(TPY)**	(gr/dscf)	**(lbs/hr)**	**(TPY)**
PM	0.003	0.99	0.25	6.00	**1.10**	0.003	**0.011**	0.0002	0	0
PM10	0.003	0.99	0.25	6.00	**1.10**	0.003	**0.011**	0.0002	**0.390**	**1.71**
SOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
NOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
VOC	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
CO	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
LEAD	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0

REMOVE

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

P47; S1: **Soap Dryer Cleanout System, Tank #2** MDR (T/hr): 84 STACK ID (DIAM:HEIGHT): 1' : 90.75'

Stack 19A, Bldg. 14 YEARLY PROD (T/yr): N/A FLOWRATE (ACFM): 1,500

CNTRL DEV: IMPINGEMENT SEPARATOR Ts(°F): 212

PERMITTED OPERATING HRS: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE	
SCC NO. 3-01-009-99			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.010	0.99	0.86	20.64	**3.77**	0.009	**0.038**	0.0008	0	0
PM10	0.010	0.99	0.86	20.64	**3.77**	0.009	**0.038**	0.0008	**0.300**	**1.31**
SOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
NOx	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
VOC	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
CO	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0
LEAD	0	0	0.00	0.00	**0.00**	0.000	**0.000**	N/A	0	0

Applicable Reg: PM10: 326 IAC 6-1-10.1(d)

The demister and the impingement separator on the Soap Dryer/Cleanout Systems Tank #1 and Tank #2 (slop tank and washout tank) will be eliminated.
These vents will be converted to natural convection vents without the use of blowers.
The use of short-chain fatty acids for wash out has been discontinued in the Soap Dryer/Cleanout Systems.
Hence, the demister and separator are no longer necessary, due to the elimination of the source of fatty acid vapors.
The cleanout systems will remain, but are removed as emission points. The PM10 SIP limitations for Stacks 18A and 19A will stay the same.

Emissions Totals Before Modification (Restoration)

Existing Equipment

	POTENTIAL EMISSIONS				ALLOWABLE		
	BEFORE CONTROLS	AFTER CONTROLS					
	(TPY)	(lbs/hr)	(TPY)		(lbs/hr)	(TPY)	
PM	**4,367**						
PM10	**3,058**	**0.71**	**3.10**		**3.09**	**13.54**	Total PM10 SIP Limitation 326 IAC 6-1-10.1(d)

Emissions Totals After Modification (Restoration)

Existing Equipment, upgrades, modifications, and removals

	POTENTIAL EMISSIONS				ALLOWABLE		
	BEFORE CONTROLS	AFTER CONTROLS					
	(TPY)	(lbs/hr)	(TPY)		(lbs/hr)	(TPY)	
PM	**4,360**						
PM10	**3,052**	**0.70**	**3.05**		**3.09**	**13.54**	Total PM10 SIP Limitation 326 IAC 6-1-10.1(d)

Overall Emissions Increase/Decrease

	POTENTIAL EMISSIONS			ALLOWABLE	
	BEFORE CONTROLS	AFTER CONTROLS			
	(TPY)	(lbs/hr)	(TPY)		
PM	**-7.1**				
PM10	**-6.1**	**-0.01**	**-0.05**		

The Soap Dryer Cleanout Systems, Tanks #1 and #2 will remain, but, will be removed as emission points. The PM10 SIP limitations for all the stacks 15, 16, 17, 17A, 18A, and 19A will remain the same.

Material Handling and Storage (most of which is already used in the current soap making processes)

The following materials will be stored in vented tanks: Betaine, Sulfonated Methyl Ester (SME), Dilute Sodium Isothionate solution (AIT-D), and Soap Rework.
All of these materials have very low vapor pressures, which account for only insignificant vapors from the tanks.
Polyethylene Glycol (PEG) and Stearic Acid (ASA-D) will be stored under nitrogen blanket in tanks equipped with conservation vents and safety relief valves.
These materials also have very low vapor pressures. The primary vapors that will be emitted from the tank vents are steam and nitrogen (during purges of product lines)

Vessel Summary

Tank #	new/existing	height/diam.	vessel name contents	capacity (gal)	vp (psia)	TPY
14-4-TK-16674	existing	16 x 10	SME Storage Tank - SME	9400	0.001	0.005
14-4-TK-29563	existing	12 x 11	PEG Storage Tank - PEG	8500	0.001	0.008
14-3-TK-31505	new	6 x 7	Slurry Mix Tank - TiO2/AIT-D	1700	neg	neg
14-4-TK-31506	new	8 x 7	Slurry Feed Tank - TiO2/AIT-D	2300	neg	neg
14-3-TK-31521	existing	5 x 5	Melt Scale Tk #2 - Rework/ASA-D	600	0.001	0.200
14-3-TK-31522	existing	5 x 5	Feed Scale Tk #2 - Rework/ASA-D	600	0.001	0.200
14-3-TK-26217	existing	4 x 5	Melt Scale Tk #3 - Rework/ASA-D	400	0.001	0.200
14-3-TK-26226	existing	5 x 5	Feed Scale Tk #3 - Rework/ASA-D	600	0.001	0.200
14-4-TK-31541	new	12 x 11	Betaine Storage Tank - Betaine	8500	0.005	0.001
14-4-TK-31559	new	14 x 14	ASA-D Storage Tank - ASA-D	16000	0.005	0.043
9-1-TK-31586	existing	32 x 12	AIT-D Storage Tank - AIT-D	27000	0.002	0.001
						Total

MSDS for these materials are on file at the Hammond Department of Environmental Management. 0.86
SME is the only new material used for this project. TPY from Truck Loading and Storage

Titanium Dioxide (TiO2)(whitening agent) and Solid Soap Rework will have dust control equipment installed on their handling systems.
Titanium Dioxide is mixed with AIT-D in a slurry making system. A supersack unloading system with an integal dust collector will handle this operation.
The dust will be recycled back into the slurry system, and the exhaust air will be filtered with a HEPA filter and vented inside the building.

TiO2 @ 63 lbs/hr @ conservative 10 lbs/ton = 1.38 TPY before control (exempt < 5 TPY)

There are no new emission points created by this modification.
Existing emission points (two of which are eliminated) have PM10 SIP limitations that do not change.
The Allowable emissions (limited potential to emit) do not change.